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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VALARIE TAMIKA WILLIAMS,
Plaintiff,
vs.
KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

Case No.: 2:23-cv-00044-VCF

**UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE CERTIFIED
ADMINISTRATIVE RECORD AND ANSWER;
~~PROPOSED~~ ORDER**

(FIRST REQUEST)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by
2 and through the undersigned attorneys, hereby moves for a forty-five day extension of time to file the
3 Certified Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to
4 Plaintiff’s Complaint are due to be filed by March 7, 2023.

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6 The certified administrative record (CAR) in this case has not been finalized for filing. The
7 agency’s Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel for the
8 Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing. Despite
9 diligent efforts OAO has indicated it still needs additional time to prepare the CAR. OAO has recently
10 been dealing with some staff shortages, changes in their processes and a surge of new filings which has
11 led to some delays in production of CARs. Counsel for the Commissioner has consulted with Plaintiff’s
12 counsel who advised that he has no objections to an extension of forty-five days. The Commissioner
13 asks for this extension with the understanding that if the certified administrative record becomes
14 available to the Office of the General Counsel before the requested date, the record will be filed earlier
15 when feasible.

16
17 This request is made in good faith and is not intended to delay the proceedings in this matter. It is
18 therefore respectfully requested that Defendant be granted an extension of time to file the CAR and
19 answer to Plaintiff’s Complaint, through and including April 21, 2023.

20
21
22 Dated: March 6, 2023

Respectfully submitted,

23 JASON M. FRIERSON
24 United States Attorney

25 /s/ Oscar Gonzalez de Llano
26 Oscar Gonzalez de Llano
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER; [PROPOSED] ORDER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 6, 2023

/s/ Oscar Gonzalez de Llano
Oscar Gonzalez de Llano
Special Assistant United States Attorney

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Attorneys for Defendant

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~~PROPOSED~~ ORDER GRANTING
EXTENSION OF TIME

1 Based upon Defendant's Motion for Extension of Time to File Certified Administrative Record and
2 Answer, and for good cause shown, **IT IS ORDERED** that the date on which Defendant's answer is due
3 is extended by forty-five days, from March 7, 2023 to April 21, 2023. Defendant shall file the answer on
4 or before April 21, 2023.

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7 IT IS SO ORDERED:

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9 _____
UNITED STATES MAGISTRATE JUDGE

10 DATED: 3-7-2023
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